To: Laidlaw, Tina[Laidlaw.Tina@epa.gov] Kelly, Myla[MKelly2@mt.gov]; tteegarden@mt.gov[tteegarden@mt.gov]; Cc: plavigne@mt.gov[plavigne@mt.gov]; Blend, Jeff[jblend@mt.gov] From: Suplee, Mike Thur 11/3/2016 4:50:00 PM Sent: Subject: Suplee review of cost memo Hi Tina; Others are still reviewing, but I am ready to provide you and TetraTech with comments on the 10/21/2016 memo: Big Picture Stuff: To match more closely with my analysis, please add a Billings, MT analysis among the >1MGDs. (And note that in the future they are supposed to be a 34 MGD plant, whereas now it is 26.) Also, how could Butte Highlands have been included on the %MHI analysis (Table 7) when it is private? Also, I have 4 additional <1MGD entities that likely need a variance, all private. Do you have any thoughts on how to tackle those, or were you planning to leave them out of this? Details: Page 1: I used flow to put privates in a flow category, TT used the NPDES Permit Rating Work Sheet (major = score 80+). TT's approach may be just fine but perhaps a footnote or something as to how the results may differ from the purely flow-based approach. Page 2, 2<sup>nd</sup> to last sentence just above Methods: It does not sound correct that major NPDES permits in Montana are written as annual or seasonal mass loads for TP, unless these permits predate adoption of the nutrient standards. Those based on the nutrient standards are seasonal and are permitted as a monthly average. Please revise. Page 3, "Existing Facility Characterization": Again, it appears Butte Highlands was thought to

have been a town. Revise.

Tables 1, 2: All the data I checked aligned with the spreadsheet I was using for my analysis, so that is good.

"Tables" at end of report: These are actually figures, and should be labeled as such. The last one, for the minors, is not numbered correctly and it is mislabeled as well (it says it is for majors). Also, in that last figure, the legend for the gray color (I presume that is "Achieving 3 mg/L TN and 0.05 mg/L TP % MHI") is cutoff.

Thanks, Mike